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July 11, 2025

VIA ECF

Hon. Ronnie Abrams
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square, Courtroom 1506
New York, NY 10007

Re: *In re Application of Martinez et al.*, 1:24-mc-00306-RA

Dear Judge Abrams:

I write on behalf of Caribbean Galaxy Real Estate Corporation and Ying Jin (together, the “Caribbean Galaxy Parties”) to, jointly with Applicants Philippe Martinez and MSR Media SKN Ltd., request a brief postponement of the July 23, 2025 oral argument set by the Court in its June 26 order (Dkt. 50). Undersigned counsel is trial counsel in *Tang Cap. Partners, L.P. v. BRC Inc.*, No. 1:22-cv-03476-RWL (S.D.N.Y.), where trial is specially set to begin on July 22, 2025 and expected to last through the end of the week, at minimum. Applicants’ counsel also has a speaking engagement on July 23. Counsel for the Caribbean Galaxy Parties and Applicants have conferred and are mutually available for argument on July 30 and 31, and August 5 and 6.¹ The parties thus respectfully request that the Court reset argument for one of these dates, subject to the Court’s availability.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Samuel G. Williamson

Samuel G. Williamson

Counsel for Caribbean Galaxy Real Estate Corporation and Ying Jin

¹ Undersigned counsel emailed counsel of record for Intervenor Timothy Harris on July 8, 2025 to request Dr. Harris’s position on the postponement of oral argument. As of the date of this filing, counsel has not responded.

cc: All counsel of record (via ECF)